

Response Deadline: May 11, 2007

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Counsel for the Harry Holt Plaintiffs

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	
	:	Chapter 11
SALTIRE INDUSTRIAL, INC.,	:	
	:	Case No. 04-15389 [BRL]
Debtor.	:	
	:	
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**NOTICE OF MOTION OF THE HARRY HOLT PLAINTIFFS FOR WITHDRAWAL
OF REFERENCE PURSUANT TO 28 U.S.C. § 157(D) AND LOCAL BANKRUPTCY
RULE 5011-1 AND CHANGE OF VENUE PURSUANT TO 28 U.S.C. §§ 1404 AND 1412**

TO: ALL PERSONS LISTED ON THE ATTACHED SERVICE LIST:

PLEASE TAKE NOTICE, that on May 4, 2007, the Harry Holt Plaintiffs,¹ by and
through the Harry Holt Plaintiffs' undersigned counsel, NAACP Legal Defense & Educational

¹ The "Harry Holt Plaintiffs" are Harry Holt, Beatrice Holt, Sheila Holt-Orsted, Jasmine Orsted, Bonita Holt, O'Brian Holt, Brandon Holt, Patrick Holt, Bianka Bentley, Demetrius Holt and David Brown, and are plaintiffs in the personal injury action *Harry Holt, et al. v. Scovill, et al.*, originally docketed at case number CV-1882 on the docket of the Circuit Court of Dickson County, Tennessee (the "Tennessee Action").

Fund, Inc. (the “NAACP LDF”) and Orrick, Herrington & Sutcliffe LLP (“Orrick”) caused to be filed with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), with a copy to the Clerk of the District Court for the Southern District of New York (the “District Court”), pursuant to Local Bankruptcy Rule 5011-1, the Motion of the Harry Holt Plaintiffs for Withdrawal of Reference Pursuant to 28 U.S.C. § 157(d) and Local Bankruptcy Rule 5011-1 and Change of Venue Pursuant to 28 U.S.C. §§ 1404 and 1412 (the “Motion”).

PLEASE TAKE FURTHER NOTICE, that pursuant to the scheduling deadlines imposed by the Honorable Alvin K. Hellerstein of the District Court at the hearing on the Harry Holt Plaintiffs’ Motion for Reconsideration on May 1, 2007, any opposition to the Motion shall be filed with the District Court and served upon counsel to the Harry Holt Plaintiffs, so as to be received no later than **May 11, 2007**. (Hr’g Tr. 39, May 1, 2007, attached to the Motion as Exhibit B.)

PLEASE TAKE FURTHER NOTICE, that the District Court shall consider the Motion and any opposition thereto solely on the papers submitted to the District Court, unless the District Court advises otherwise.

Dated: New York, New York
May 4, 2007

By: _____
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-and-

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